


CERTIFICATE OF CONFERENCE


I hereby certify that I conferred with opposing counsel and the United States opposes this Motion.



Charles C. Morgan

CERTIFICATE OF SERVICE

I certify that on September 24, 2024, I electronically filed this document on the Court's CM/ECF system, which will automatically serve a Notice of Electronic Filing on all attorneys of record.



Charles C. Morgan

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ROWLAND MARCUS ANDRADE
and ABTC Corp.,

Movants,

VS.

**UNITED STATES DEPARTMENT
OF THE TREASURY, INTERNAL
REVENUE SERVICE,**

Respondent.

[illegible]

Case No. 4:24-MC-00248

ORDER ON MOVANTS' MOTIONS FOR A STAY OF THE COURT'S AUGUST 8, 2024
ORDER AND AN INJUNCTION ENJOINING THE RESPONDENT FROM
ACCESSING AND/OR USING ANY RECORDSS RECEIVED PURSUANT TO ANY
SUMMONSES WHILE MOVANTS' APPEAL WITH THE FIFTH CIRCUIT COURT OF
APPEALS IS PENDING

The Court, having reviewed the Motions submitted by Movants pursuant to Rule 8(a)(1)(A) of the Federal Rules of Appellate Procedure (FRAP) to Stay the Order dated August 8, 2024 (Dkt. No. 41) and to enter an Order pursuant to Rule 8(a)(1)(C) of the FRAP granting an injunction enjoining Respondent from accessing and/or using any records received pursuant to any summonses while Movants' appeal is pending, for good and sufficient reasons, it is hereby ORDERED that:

1. Movants' motion to Stay the Order dated August 8, 2024 is [] GRANTED [] DENIED.
2. Movants' motion for an injunction enjoining Respondent from accessing and/or using any records received pursuant to any summonses is [] GRANTED [] DENIED and the Internal Revenue Service is directed to comply forthwith while Movants' appeal is pending.

It is SO ORDERED.

Signed this _____ of _____, 2024

Drew B. Tipton
UNITED STATES DISTRICT JUDGE